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15 Attorneys for Defendant
16 Otto Trucking LLC

17 **UNITED STATES DISTRICT COURT**
18 **NORTHERN DISTRICT OF CALIFORNIA**
19 **SAN FRANCISCO DIVISION**

20 Waymo LLC,

21 Plaintiff,

22 v.

23 Uber Technologies, Inc.; Ottomotto LLC; Otto
24 Trucking LLC,

25 Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF SHANE BRUN IN
SUPPORT OF DEFENDANTS' REPLY IN
SUPPORT OF MOTION FOR SUMMARY
JUDGMENT**

Date: September 20, 2017
Time: 8:00 a.m.
Courtroom: 8 (19th Floor)
Judge: Hon. William Alsup

Filed/Lodged Concurrently with:

1. Defendants' Reply in Support of Motion
for Summary Judgment

Trial: October 10, 2017

1 I, SHANE BRUN, declare:

2 1. I am a partner with the law firm Goodwin Procter LLP. I am a member in good
3 standing of the Bar of the State of California and the Bar of this Court. I make this declaration
4 based on personal knowledge and, if called as a witness, I could and would testify competently to
5 the matters set forth herein. I make this declaration in support of Defendants' Reply in Support of
6 Defendants' Motion for Summary Judgment.

7 2. Attached hereto as Exhibit 1 is a true and correct copy of excerpts of the Deposition
8 of Adam Bentley in his capacity as the 30(b)(6) witness for Otto Trucking, dated August 22, 2017.

9 3. Attached hereto as Exhibit 2 is a true and correct copy of excerpts of the Deposition
10 of Lior Ron, dated June 19, 2017.

11 4. Attached hereto as Exhibit 3 is a true and correct copy of Exhibit D to the
12 Framework Agreement bearing Bates numbers OTTOTRUCKING00002925-2926.

13 I declare under penalty of perjury under the laws of the United States that the foregoing is
14 true and correct. Executed this 18th day of September, 2017 in San Francisco, California.

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16 /s/ Shane Brun
17 SHANE BRUN
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ATTESTATION OF E-FILED SIGNATURE

I, Michael A. Jacobs, am the ECF User whose ID and password are being used to file Declaration of Shane Brun in Support of Defendants' Reply in Support of Motion for Summary Judgment. In compliance with General Order 45, X.B., I hereby attest that Shane Brun has concurred in this filing.

Dated: September 18, 2017

/s/ Michael A. Jacobs

MICHAEL A. JACOBS